

Redaction: personal information

From: [REDACTED]
To: [Jordan, Deborah](#)
Subject: Fwd: from Tony Davis on the Navajo decision
Date: Monday, July 28, 2014 5:23:58 PM

Sent from my iPhone

Begin forwarded message:

From: "Lyons, Ann" <Lyons.Ann@epa.gov>
Date: July 28, 2014 at 4:32:43 PM PDT
To: Deborah Jordan <[REDACTED]>
Subject: FW: from Tony Davis on the Navajo decision

Redaction: personal information

Ann Lyons
Office of Regional Counsel
U.S.E.P.A.
75 Hawthorne Steet
San Francisco, CA 94107
415-972-3883
lyons.ann@epa.gov

From: Lee, Anita
Sent: Monday, July 28, 2014 2:57 PM
To: Lyons, Ann; PerezSullivan, Margot; McKaughan, Colleen
Subject: RE: from Tony Davis on the Navajo decision

Here is the cite to the document in the docket where he can look at emission numbers:

<http://www.regulations.gov/#!documentDetail;D=EPA-R09-OAR-2013-0009-0454>

look at Excel File called "2014_0311 Better than BART Alternatives for Final Rule"

From: Lyons, Ann
Sent: Monday, July 28, 2014 2:56 PM
To: PerezSullivan, Margot; McKaughan, Colleen; Lee, Anita
Subject: RE: from Tony Davis on the Navajo decision

Try this:

The original BART proposal required reductions be achieved 5 years after the final rule

from installing and operating a control technology. There was no cap, just an emission limit.

The final rule achieves reduction in two phases and uses a cumulative cap on emissions over a longer time period. Although actual emissions in a given year under the Final Rule will vary, the cumulative cap results in greater NOx emissions reductions than BART.

Ann Lyons
Office of Regional Counsel
U.S.E.P.A.
75 Hawthorne Steet
San Francisco, CA 94107
415-972-3883
lyons.ann@epa.gov

From: PerezSullivan, Margot
Sent: Monday, July 28, 2014 2:35 PM
To: Lyons, Ann; McKaughan, Colleen; Lee, Anita
Subject: RE: from Tony Davis on the Navajo decision

Great! Thanks!!

Margot Perez-Sullivan
U.S. Environmental Protection Agency
D: 415.947.4149 C: 415.412.1115 E:perezsullivan.margot@epa.gov

From: Lyons, Ann
Sent: Monday, July 28, 2014 2:34 PM
To: McKaughan, Colleen; Lee, Anita; PerezSullivan, Margot
Subject: RE: from Tony Davis on the Navajo decision

Margot – Anita and I are trying to draft a couple of sentences to explain the difference so you can respond to Tony.

Ann Lyons
Office of Regional Counsel
U.S.E.P.A.
75 Hawthorne Steet
San Francisco, CA 94107
415-972-3883
lyons.ann@epa.gov

From: McKaughan, Colleen

Sent: Monday, July 28, 2014 2:24 PM
To: Lee, Anita; PerezSullivan, Margot; Lyons, Ann
Subject: RE: from Tony Davis on the Navajo decision

Do we want to mention the additional benefits for SO₂, CO₂, mercury from the shutdown?

From: Lee, Anita
Sent: Monday, July 28, 2014 2:20 PM
To: PerezSullivan, Margot; McKaughan, Colleen; Lyons, Ann
Subject: RE: from Tony Davis on the Navajo decision

The 84% for the proposal was not wrong. Basically, that number is based on anticipated tpy emissions in 2019 under BART compared to baseline.

Under the final action, there are 4 scenarios. Two scenarios (TWG A1 and A2) would achieve 87 and 86% reduction in 2031 (i.e., estimated tpy emissions in 2031), whereas for TWG A3 we estimate about 82% in 2031. The distribution of emissions over time is different, which is why we did not want to put out a tpy reduction number. Even though TWG A3 in a given year may be higher than BART, overall, over 2009-2044, total emissions of NO_x will not exceed the cap, ensuring "better than BART". I have a spreadsheet in the docket. I did the % reduction numbers separately, but it is easy enough to reproduce from the docketed spreadsheet.

The important part is that the cap will ensure that NGS achieves emission reductions over time so that total emissions from the facility over 2009-2044 are less than would have been emitted if we had finalized BART as proposed.

Ann, please let me know what you feel comfortable saying versus sending?

From: PerezSullivan, Margot
Sent: Monday, July 28, 2014 2:12 PM
To: McKaughan, Colleen; Lee, Anita
Subject: Fwd: from Tony Davis on the Navajo decision

Begin forwarded message:

From: Tony Davis <tdavis789@yahoo.com>
Date: July 28, 2014 at 1:28:02 PM PDT
To: "PerezSullivan.Margot@epamail.epa.gov"
<PerezSullivan.Margot@epamail.epa.gov>
Subject: from Tony Davis on the Navajo decision
Reply-To: Tony Davis <tdavis789@yahoo.com>

Margot,

The following paragraph comes from Page 5 of your 218-page final rule:

EPA's action to finalize an alternative to BART consistent with the TWG Agreement will achieve greater NO_x emission reductions at lower cost than BART in exchange for flexibility in the timeframe for achieving NO_x reductions. When fully implemented, this Final Rule requires over an 80 percent reduction in NO_x emissions from NGS and is expected to significantly reduce the impact of NGS on visibility at 11 mandatory Class I Federal areas.

Margot, our earlier clips, both from me and from the AP, said that your earlier, BART-based proposal, would have reduced emissions by 84 percent. Was that wrong? If it was wrong, what was the correct figure for proposed emissions reductions under the BART plan?

If it wasn't wrong, and the original proposal was 84 percent, what makes this current proposal "Better than Bart?" in terms of its emissions reductions?

Thanks for your help and sincerely,

Tony Davis
Arizona Daily Star
520-349-0350 C
520-806-7746 O